

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)**

GLOBAL POLICY PARTNERS, LLC, *et al.*,

Plaintiffs,

vs.

BRENT YESSIN, *et al.*,

Defendants.

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) **Civil Action No. 1:09-cv-859 TSE/TRJ**
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PLAINTIFFS' MOTIONS *IN LIMINE*

Plaintiffs Global Policy Partners, LLC ("GPP") and Katherine Friess ("Ms. Friess), by and through their undersigned counsel, respectfully submit their Motions *in Limine*.

In accordance with the Court's November 24, 2009 Opinion and the evidence adduced in this case, Plaintiffs move this Court, *in limine*, to exclude evidence and testimony: (1) that Defendant is the sole Manager of GPP and that as the sole or 1 of 3 Managers he had authority to access Plaintiffs' email accounts; (2) regarding the Operating Agreement that Defendant alone executed (without the knowledge or approval of the other Managers and Members), or that this Operating Agreement gave him authority to access Plaintiffs' email accounts or become the only Manager and Member of GPP; (3) that Defendant is the sole Member of GPP and that as a non-Member, 10% Member or the sole Member he had authority to access Plaintiffs' email accounts; (4) that Defendant allegedly loaned Plaintiffs monies and that by doing so he had authority to access Plaintiffs' email accounts and become the sole Manager and Member of GPP; (5) that Ms. Friess allegedly stored her password on Defendant's computer and, by doing so, gave Defendant

authority to access Plaintiffs' email accounts; and (6) whether GPP is a proper or valid plaintiff in this case.

The grounds for these Motions are fully set forth in the accompanying Memorandum of Points and Authorities and accompanying Exhibits that are submitted concurrently herewith.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant these Motions in their entirety.

Dated: January 27, 2010

Respectfully Submitted,

PLAINTIFFS

By Counsel

/s/

Bernard J. DiMuro, Esq.
Virginia State Bar #18784
Stephen L. Neal, Jr., Esq. (*pro hac vice*)
Stacey Rose Harris, Esq.
Virginia State Bar #65887
Stephen J. Stine, Esq.
Virginia State Bar #66738
Counsel for Plaintiffs
DiMuroGinsberg, P.C.
908 King Street, Suite 200
Alexandria, VA 22314
Phone: (703) 684-4333
Fax: (703) 548-3181
E-Mails: bdimuro@dimuro.com;
sneal@dimuro.com; sharris@dimuro.com;
sstine@dimuro.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 27th day of January, 2010, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following counsel of record:

Charles M. Sims, Esq.
Counsel for Defendants
LeClairRyan
951 East Byrd Street, 8th Floor
Richmond, VA 23219
Phone: (804) 343-5091
Fax: (804) 783-7655
Email: charles.sims@leclairryan.com;

C. Matthew Haynes, Esq.
Counsel for Defendants
LeClairRyan
2318 Mill Road, Suite 1100
Alexandria, VA 22314
Phone: (703) 684.8007
Fax: (703) 684- 8075
Email: matthew.haynes@leclair.com

_____/s/_____
Bernard J. DiMuro, Esq.
Virginia State Bar #18784
Stephen L. Neal, Jr., Esq. (*pro hac vice*)
Stacey Rose Harris, Esq.
Virginia State Bar #65887
Stephen J. Stine, Esq.
Virginia State Bar #66738
Counsel for Plaintiffs
DiMuroGinsberg, P.C.
908 King Street, Suite 200
Alexandria, VA 22314
Phone: (703) 684-4333
Fax: (703) 548-3181
E-Mails: bdimuro@dimuro.com;
sneal@dimuro.com; sharris@dimuro.com;
sstine@dimuro.com